

1 Christopher W. Olmsted, Esq. (SBN 173771)
2 BARKER OLMSTED & BARNIER APLC.
3 3550 Camino del Rio N., Suite 303
4 San Diego, CA 92108
5 Tel: (619) 682-4040
6 Fax: (619) 220-7056

7 Attorneys for Plaintiffs SYNDROME DISTRIBUTION,
8 INC.

9 Michael W. Ellison, Esq.
10 Suzanne Burke Spencer, Esq.
11 SMITH ELLISON
12 7700 Irvine Center Drive, Suite 730
13 Irvine, CA 92618
14 Tel: (949) 442-1500
15 Fax: (949) 442-1515

16 Steven L. Permut, Esq.
17 Richard Hoffmann, Esq.
18 REISING ETHINGTON PC
19 755 W. Big Beaver Road, Suite 1850
20 Troy, Michigan 48084
21 Tel: (248) 689-3500
22 Fax: (248) 689-4071

23 Attorneys for Defendant TGM DISTRIBUTION, INC.
24 dba TGM SKATEBOARDS

25 **IN THE UNITED STATES DISTRICT COURT**

26 **FOR SOUTHERN DISTRICT OF CALIFORNIA**

27 SYNDROME DISTRIBUTION, INC. a
28 California Corporation

Plaintiff,

v.

TGM DISTRIBUTION, INC. dba TGM
SKATEBOARDS, a Michigan
Corporation,

Defendant

CASE NO.: 11 CV 0945 BTM CAB

**AGREED MOTION TO DISMISS WITH
PREJUDICE AGAINST DEFENDANT TGM
DISTRIBUTION, INC. dba TGM
SKATEBOARDS**

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and the terms of a
separate Confidential Settlement Agreement and License Agreement, the Plaintiff, Syndrome

1 Distribution, Inc. ("Syndrome") and Defendant, TGM Distribution Inc., d/b/a TGM Skateboard
2 ("TGM") have agreed to settle, adjust and compromise all claims in the above-captioned action.
3 The parties therefore, move this Court to dismiss the above-entitled cause and all claims by
4 Syndrome against TGM and all claims by TGM against Syndrome made therein with prejudice to
5 the re-filing of same. The Parties further request that the proposed Order accompanying this
6 motion be entered on October 18, 2011, unless requested earlier by counsel for Plaintiff.

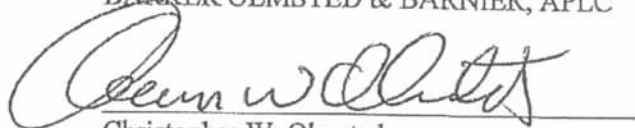
7 The parties further move the court to order that all costs and expenses relating to this
8 litigation (including attorney and expert fees and expenses) shall be borne solely by the party
9 incurring same.

10 A proposed Order accompanies this Motion.

11
12 APPROVED AS TO FORM AND CONTENT:

13
14 Dated: October 14, 2011

BARKER OLMSTED & BARNIER, APLC

15
16 

17 Christopher W. Olmsted
18 Attorneys for Plaintiff SYNDROME
19 DISTRIBUTION, INC.

20 Dated: October 21, 2011

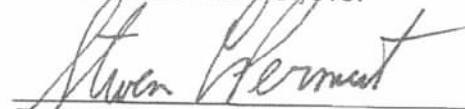
SMITH ELLISON, P.C.

21
22 

23 Michael W. Ellison
24 Attorneys for Defendant TGM
25 DISTRIBUTION, INC. dba TGM
26 SKATEBOARDS
27
28

1
2 Dated: October 20, 2011
3
4

REISING ETHINGTON, P.C.



Steven L. Permut, *Pro Hac Vice*
Attorneys for Defendant TGM
DISTRIBUTION, INC. dba TGM
SKATEBOARDS